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December 22, 2022

VIA ECF

The Honorable Gabriel W. Gorenstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

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Re: *Eckhart v. Fox News Network, LLC, et al.*, Case No. 1:20-cv-5593 (RA) (GWG)

Dear Judge Gorenstein:

We represent Defendant Fox News Network, LLC (“Fox News”) in the above-referenced matter. We write pursuant to Rule 1(E) of Your Honor’s Individual Practices to request an extension of time to answer, move, or otherwise respond to Plaintiff’s Fourth Amended Complaint.

Plaintiff filed a Fourth Amended Complaint on December 20, 2022. (See Dkt. No. 227.) Pursuant to Fed. R. Civ. P. 15(a)(3), Fox News’s deadline to answer, move, or otherwise respond is January 3, 2023. Fox News requests an extension through January 20, 2023 in light of the upcoming holidays and related travel schedules.

This is Fox News’s first request for an extension for its response to Plaintiff’s Fourth Amended Complaint. Plaintiff consents to this request.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Rachel S. Fischer
Rachel S. Fischer

Cc: All counsel of record (via ECF)